

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION

JOBBIE FLOWERS,

Plaintiff,

v.

ELECTROLUX NORTH AMERICA, INC.,

Defendant.

Civil Action No. 3:20-CV-517-RJC-DCK

Declaration of Kopal Rawat

I, Kopal Rawat, state that the facts set forth below are true and correct to the best of my knowledge, information, and belief, and if called to do so, could testify truthfully thereto:

1. In 2019, I was Jobbie Flowers' manager at Electrolux North America, Inc., where we were both employed in the information technology ("IT") department. At all relevant times, I held the position of Application Development and Support Manager, and Flowers held the position of "Team Lead, Application Support."

2. I requested information about the team's projects and work from Flowers more often than other members of the team I managed because Flowers was the only team lead. While not a management position, the position of team lead has a higher salary and more responsibilities than the position of "Application Support Analyst," which the other team members held.

3. While the position of team lead had added responsibilities, the most important function of that position, like with the application support analyst position, was resolving tickets referred from the IT help desk.

4. In May 2019, Flowers and the rest of his team were assigned a training session regarding a software called Service Now. Flowers decided not to attend the training and did not

notify me. When I asked him about it, he said that he did not think it was necessary. I explained to him that as he is the team lead, it is necessary for him to learn new technologies with the team.

5. During much of 2019, my team was working on a project called the SharePoint migration. On October 11, 2019, the project manager for this project, Roy Harris, told me that Flowers had stopped attending the regular meetings for team members working on this project and that he had received no update on the tasks assigned to Flowers. A copy of this text conversation is attached as **Exhibit 1**.

6. I had discussed the SharePoint migration project with Flowers, along with his role in it, at several of our one-on-one meetings dating back to June 2019. During this time, it was a struggle to keep Flowers focused on this project and motivate him to complete his assigned tasks on time.

7. I instructed Flowers to attend the scheduled SharePoint meeting on October 17, 2019. Flowers did so but raised his voice and became aggressive during the meeting. After the meeting, Flowers walked over to my desk and began raising his voice and arguing about the meeting. I asked him to schedule a one-on-one meeting where we could discuss his concerns further, but he interrupted me and continued arguing in a loud voice.

8. During the time that Flowers was employed at Electrolux, I did not know that Flowers had diabetes or any other disability. I first learned that Flowers had diabetes after the litigation in this case began.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on June 28, 2021.

Kopal Rawat ..

Kopal Rawat